



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

December 15, 2005

Dear ENERGY STAR® Roof Products Partner or Other Industry Stakeholder:

Over the past several months the US Environmental Protection Agency (EPA) has been investigating a number of options for revising the current ENERGY STAR roof products specification. As stated in EPA's initial memo to stakeholders in February, the primary purpose of this investigation was to determine the feasibility of including a requirement for emissivity of roof products. Since distributing this memo, EPA has received a number of comments regarding emissivity and other specification requirements to consider while revising the specification.

I am now pleased to provide you with a Draft 1 Version 2.0 specification for your review and comment. This document outlines the proposed new energy-efficiency requirements that roof products would need to meet in order to earn the ENERGY STAR. It is intended that once final, this specification will replace the current Version 1.0 specification.

The Draft 1 Version 2.0 specification incorporates the following key changes:

- A new requirement for initial thermal emittance of 0.75 is included for all roof products. All Partners must submit thermal emittance data for all ENERGY STAR qualified products by the effective date of the revised specification in order to remain on the qualifying products list.
- Test procedures for thermal emittance, ASTM C1371 and ASTM E408, are now included in Section 4, Test Criteria.
- Variegated roof products, such as composite shingles, may now also be tested according to CRRC Test Method #1, which is referenced in the specification.
- Once this specification revision is effective, all new testing for the maintenance of solar reflectance must be on uncleaned samples. Products that are currently on the qualifying products list for which data for cleaned samples were submitted, will remain on the list, but will be marked as such and may be listed separately. No new data using cleaned samples will be accepted.

Further explanation regarding these proposed changes can be found within note boxes throughout the Draft 1 specification.

EPA is also considering an increase in the initial low slope roof product solar reflectance requirement to 0.70, while still maintaining the aged value at 0.50. Although this proposed change was not included in the February correspondence and is not included in the text of this document (only in the note box on Page 6), this change would allow ENERGY STAR to maintain relevancy in the market by aligning the program requirements with those of other state and regional initiatives. As a result, EPA is particularly interested in feedback on this proposal.

Lastly, EPA received comments regarding the allowance of accelerated aging techniques to determine the maintenance of solar reflectance. To date, most stakeholders are against the allowance of accelerated aging because no existing test procedure adequately emulates the conditions found in the field. EPA continues to be interested in accelerated aging if a test procedure is developed and data can be produced that shows results similar to that found by using in-field aging.

All interested stakeholders will have until January 19, 2006 to provide feedback on this Draft 1 specification. Comments should be sent to Charles Anderson, ICF Consulting, via e-mail at canderson@icfconsulting.com. At the end of the comment period, EPA will carefully review and consider all comments submitted and distribute subsequent drafts, as necessary.


It is EPA's intention to finalize this Version 2.0 specification as soon as discussions with stakeholders are completed. Once the specification is finalized, partners will be required to acknowledge the new Version 2.0 specification by submitting an updated Commitment Form. **Furthermore, as of the proposed October 31, 2006 effective date, only those models that meet the requirements of the new Version 2.0 specification, including the new emissivity requirements, can continue to bear the ENERGY STAR mark.** Qualifying Product Information (QPI) Forms will be revised to reflect the new program requirements. Existing products that are not able to meet the new requirements will no longer qualify as ENERGY STAR and will be removed from the Qualified Products List on the ENERGY STAR Web site after the partner has been notified. Similarly, those manufacturers that fail to submit emittance data to EPA will see their products de-listed from the ENERGY STAR Web site.

The exchange of ideas and information among EPA, industry, and other interested parties is critical to the success of ENERGY STAR. As such, you are strongly encouraged to provide prompt feedback. All comments will be posted to the ENERGY STAR Product Development Web site unless the submitter requests that their comments remain confidential. If you support the Draft 1 Version 2.0 specification, or do not wish to comment, please state this in writing or via email. It is equally important that EPA understand which portions of the draft specification meet with stakeholder approval, in addition to identifying the sections that may need further revision.

To track EPA's progress in revising the ENERGY STAR specification for roof products and to review comments, visit the Product Development Web site at www.energystar.gov/productdevelopment and click on "Revisions to Existing Product Specifications" on the right navigation bar.

Thank you for taking the time to review this draft specification. I look forward to working with you over the next few months. Please feel free to contact me directly with any questions or concerns at (202) 343-9123 or via e-mail at ryan.steven@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Steven J. Ryan". The signature is written in a cursive style. To the right of the signature is a vertical red line.

Steven Ryan
ENERGY STAR for Roof Products